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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RUBY CELLY URIBE,  
  
Defendant.

CASE NO. 2:24-MJ-00001-DB

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: January 26, 2024  
TIME: 2:00 p.m.  
COURT: Hon. Jeremy D. Peterson

**STIPULATION**

The United States, by and through its undersigned counsel, and the defendant, by and through her counsel of record, hereby stipulate as follows:

1. By prior order, this matter was set for Preliminary Hearing on January 26, 2024. ECF No. 6.
2. By this Stipulation, the parties now move to continue the Preliminary Hearing until February 6, 2024, at 2:00 p.m.
3. The defendant was brought into federal custody on January 5, 2023. She made her initial appearance the same day, and was released on pretrial conditions. ECF Nos. 6, 8, 10.
4. On January 19, 2024, the United States provided an initial batch of pre-indictment discovery, and made two forensic extractions available for defense review. Counsel for the defendant needs time to review the materials, conduct defense investigation, and consult with the defendant.

5. The parties need further time to discuss this matter, discuss any potential consequences, and to allow counsel for the defendant reasonable time necessary for preparation and further investigation.
6. The defendant understands that pursuant to 18 U.S.C. § 3161(b), “any information or indictment charging an individual with the commission of an offense shall be filed within thirty days from the date on which such individual was arrested.” Time may be excluded under the Speedy Trial Act if the Court finds that the ends of justice served by granting such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The parties jointly move to exclude time within which any indictment or information shall be filed from January 26, 2024, through and including February 6, 2024, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), because failure to do so would “deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.”
7. Good cause exists under Rule 5.1(d) of the Federal Rules of Criminal Procedure.

**IT IS SO STIPULATED**

Dated: January 19, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ ADRIAN T. KINSELLA  
ADRIAN T. KINSELLA  
Assistant United States Attorney

Dated: January 19, 2024

By: /s/ HOOTAN BAIGMOHAMMADI  
HOOTAN BAIGMOHAMMADI  
Attorney for Defendant

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: January 19, 2024

  
DEBORAH BARNES  
UNITED STATES MAGISTRATE JUDGE